

# LIFELINE NATIONAL VERIFIER PLAN

JULY 2018



Universal Service  
Administrative Co.

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# Overview of the National Verifier Plan

## PURPOSE

This document describes the systems and processes of the National Verifier (NV), provides a status of the project, and details the work that remains to make it a success.

## BACKGROUND

**This is the third update of the National Verifier Plan (the NV Plan) which was created in response to the [2016 Lifeline Order](#) adopted by the Federal Communications Commission (FCC) in March 2016.**

- Since the initial release of the NV Plan in January 2017, this document has been updated every six months, as required by the 2016 Lifeline Order.
- The initial release and each subsequent update has been approved by the Wireline Competition Bureau and the Office of the Managing Director at the FCC.

**In addition to the NV Plan, interested parties can reference the [NV section of the USAC website](#) for updates on the NV implementation. Stakeholders are always welcome to provide comments on the NV Plan to USAC by visiting the NV website.**

- Comments can also be submitted via email at [LifelineProgram@usac.org](mailto:LifelineProgram@usac.org); however, USAC recommends that stakeholders use the functionality on the NV website.

## Status of the National Verifier

**On June 18, 2018, USAC and the FCC deployed the NV system, kicking off the initial Soft Launch phase for the following six states:**

- Colorado
- Mississippi
- Montana
- New Mexico
- Utah
- Wyoming

**Service Providers (SPs) in these states have access, but are not required, to use the NV system during the Soft Launch phase.** The Hard Launch phase is expected to occur later this year, at which time carriers in those six states will be required to use the NV system. Advanced notice of the hard launch will be provided to all SPs and state agencies in the initial wave. Consumers in those states will also have access to the system at that time.

**After the initial launch, USAC and the FCC will continue to roll additional groups of states and territories into the NV.** These roll-outs will be structured similarly to the initial deployment, with an optional soft launch phase before the mandatory hard launch. See the Eligibility Data Sources section of this document for more information around the role of states in the NV implementation.

Detailed content, geared toward specific stakeholder groups, is being communicated regularly through [NV website](#), [newsletters](#), and [webinars](#).

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# The FCC charged USAC to develop and implement the National Verifier to determine Lifeline eligibility

In March 2016, the FCC adopted the 2016 Lifeline Order, further updating the Lifeline program to, among other things, streamline eligibility verification for enrollment and recertification.

The 2016 Lifeline Order tasked USAC with the creation of a National Verifier to standardize eligibility verification across all states and territories and to perform the following functions:

- Create the Lifeline Eligibility Database (LED), which will be connected to state and federal data sources,<sup>1</sup> to determine eligibility for both initial enrollment, and annual recertification;
- Allow SPs and consumers to check eligibility or enrollment status; and
- Calculate payments to SPs based on data available through National Verifier.

Additionally, in December 2017, the FCC released [a new order \(Fourth Report and Order\)](#) focused on the following Tribal initiatives:

- Targeting enhanced support on Tribal lands to rural areas
- Utilizing mapping resources for enhanced rural Tribal lands support
- Requiring independent verification of residency on rural Tribal lands
- Targeting enhanced Lifeline Tribal support to facilities-based providers

USAC and the FCC will be executing the requirements of the Fourth Report and Order over the next several months. The Tribal changes will impact NV processes and USAC is working on both in parallel. Stay tuned for more information on [our website](#).

1. Data sources of qualifying eligibility programs (e.g., Medicaid)

# In the 2016 Lifeline Order, the FCC identified three main goals for the National Verifier

1

## Stronger Program Integrity



- Independent eligibility verification, with more automatic checks, conducted directly by USAC to reduce waste, fraud, and abuse
- Single eligibility system to audit and report on potential fraud metrics
- Streamlined, consistent processes to distinguish mistakes from waste, fraud, and abuse

2

## Enhanced Customer Experience



- Streamlined access to eligibility information for SPs
- States relieved of maintaining computer matching agreements and interfaces with multiple SPs
- More automatic checks of data sources to determine eligibility
- Central source of program information and support for consumers

3








## Cost Effectiveness



- SPs relieved of eligibility verification burden
- Lower cost to aggregated system due to more streamlined processes:
  - More automated verification to reduce costly manual reviews; and
  - More automated recertification to reduce costly outreach

**The NV is designed to meet these objectives. Stakeholder feedback on how to meet these goals is critical, and we are continuously integrating input throughout the multi-year implementation and rollout of the NV.**

# There are a variety of different criteria by which applicants can demonstrate eligibility for Lifeline

		Current % of Lifeline applicants qualifying through criterion <sup>1</sup>	Comments
Medicaid		29%	<ul style="list-style-type: none"> <li>Qualify through enrollment in Medicaid</li> </ul>
SNAP		33%	<ul style="list-style-type: none"> <li>Qualify through enrollment in SNAP</li> </ul>
SSI		2%	<ul style="list-style-type: none"> <li>Qualify by receiving SSI payments</li> </ul>
Federal Public Housing Assistance		0.6%	<ul style="list-style-type: none"> <li>Qualify by receiving public federal housing benefits</li> </ul>
Income		7%	<ul style="list-style-type: none"> <li>Qualify if income is at or below 135% of the federal poverty line</li> </ul>
Tribal <sup>2</sup>		0.1%	<ul style="list-style-type: none"> <li>Qualify by receiving certain tribally-focused assistance programs<sup>3</sup></li> </ul>
VA		0.1%	<ul style="list-style-type: none"> <li>Qualify by receiving the Veterans Pension / Survivor Benefits</li> </ul>

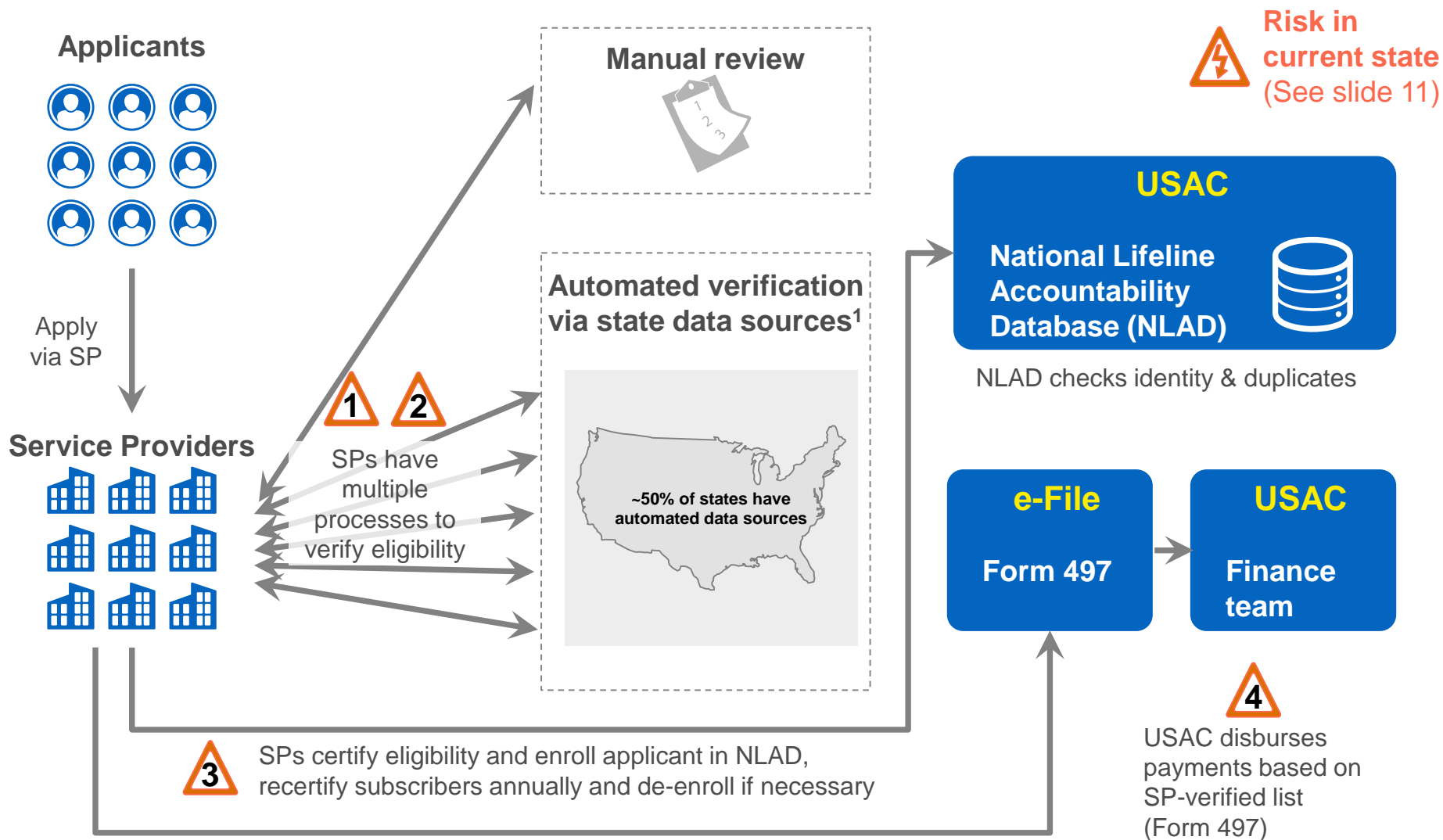
1. Percentages as of June 2018. Numbers do not add to 100% due to rounding and the 2016 Lifeline Order's removal of certain qualifying criteria for Lifeline eligibility determination..

2. Must live on tribal land to qualify through tribal programs

3. Bureau of Indian Affairs General Assistance, Tribally-administered Temporary Assistance for Needy Families, income-based Head Start, or the Food Distribution Program on Indian Reservations




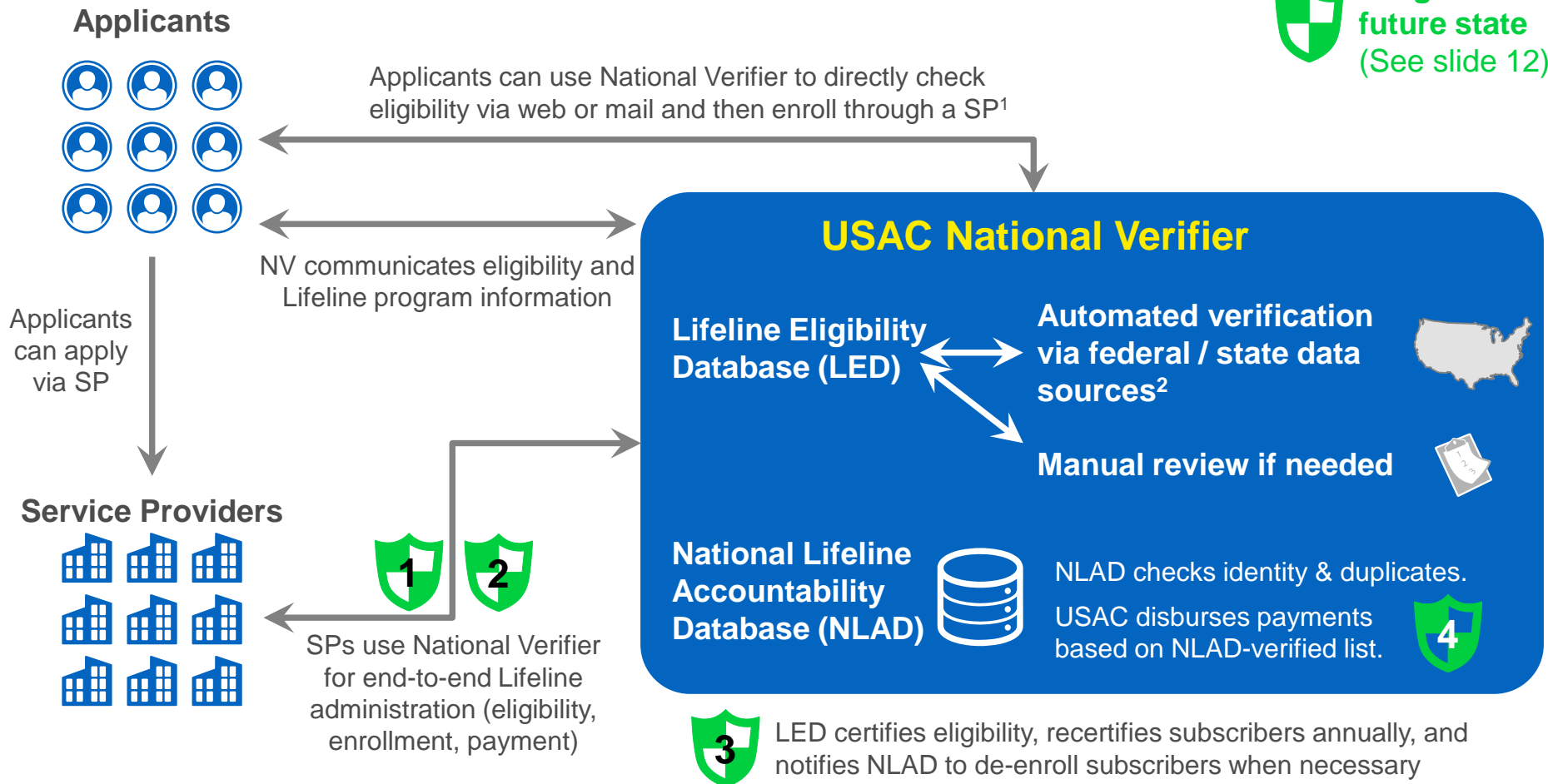
# Lifeline will move from the current state where Service Providers conduct eligibility verification...



1. For example: Medicaid, SNAP, SSI

# ...to a future state where USAC conducts eligibility verification through the National Verifier...

 **Mitigation in future state**  
(See slide 12)



1. If eligible, applicant receives application number and list of nearby SPs  
2. For example,, Medicaid, SNAP, SSI

## ...which is designed to address several program integrity risks in the current Lifeline program

### Current program integrity risk



**SPs conducting Lifeline eligibility verification creates potential for waste, fraud, and abuse**



**Variation in eligibility verification processes across SPs and states creates potential for confusion, errors, inconsistency**



**Subscribers whose eligibility has lapsed may not be timely de-enrolled from NLAD**



**Payment complexity due to separate processes for enrollment and claims for reimbursement**

### Planned NV mitigation strategy



**Centralize eligibility verification with USAC, a neutral party**



**Standardize eligibility verification processes through the National Verifier**

- More automated verification by pinging state and federal data sources increases accuracy
- Centralized manual reviews conducted by BPO vendor that adheres to consistent quality control standards



**Automate recertification to re-confirm eligibility (removing need for self-certification for majority of subscribers)**

**Automate de-enrollment of subscribers due to non-response for self-certification**



**Unified NLAD / LED systems streamline ability to tie disbursements directly to subscribers claimed in NLAD**

# USAC is taking near-term steps to improve these risk areas in parallel to building the National Verifier

## Current program integrity risk



SPs conducting Lifeline eligibility verification creates potential for waste, fraud, and abuse



Variation in eligibility verification processes across SPs and states creates potential for confusion, errors, inconsistency



Subscribers whose eligibility has lapsed may not be timely de-enrolled from NLAD



Payment complexity due to separate processes for enrollment and claims for reimbursement

## Planned near-term mitigation strategy



USAC samples eligibility verifications performed by SPs, tracks activity by sales agent, and continues to enhance audit processes including the creation of a forensic audit program



USAC ensures that SPs are using the available state data sources to minimize manual review processes, and verifies this through sampling and audits



USAC samples recertifications performed by SPs, monitors for deceased subscribers who should no longer be claimed, and continues to enhance audit processes



Beginning with the January 2018 data month, service providers in all states are paid based on the number of subscribers in NLAD.

# With the implementation of the National Verifier, eligibility verification will shift from Service Providers to USAC

## Service Providers

Facilitate consumer application process

Support document upload for manual eligibility checks (if needed)

Provide consumer support as appropriate

Retain applicant-provided eligibility / identity documents according to Lifeline rules for new applicants

Check state sources (including manual review where necessary) to confirm consumer eligibility

Conduct annual recertifications<sup>1</sup>

## USAC

Conduct identity and duplicate checks (NLAD)

Process consumer applications and confirm eligibility prior to enrollment

Conduct all annual recertifications

Provide full service consumer support

Complete computer matching agreements with state and federal agencies

*New roles*

*Reduced burdens*

The NV also reduces burden on some state and federal agencies who currently share eligibility data with multiple service providers. Under the NV, the agencies only need to share data with one entity, USAC.

1. Service Providers can currently elect USAC to conduct annual recertification.

## High-level overview of the system

### Eligibility

#### Lifeline Eligibility Database (LED)

- One eligibility engine with many functions:
  - Query qualifying program data sources to determine eligibility;
  - Store yes / no eligibility results; and
  - Queue applications to BPO for manual review when necessary<sup>1</sup>
- Portals for eligibility verification (e.g., consumer web portal)

Federal /  
State data  
sources



### Enrollment

#### National Lifeline Accountability Database (NLAD)

- Database of all enrolled Lifeline subscribers for calculating payments to SPs;
- Services to check duplicate subscribers / addresses and verify identity; and
- Portal for subscriber updates



**From a technical standpoint, LED and NLAD are tightly integrated as part of the single NV solution to ensure a streamlined experience.**

1. For example, income verification or when applicant not found automatically in federal / state data sources

# Functions and processes in place to support the system

New capabilities come from both internal and external sources

## USAC capabilities

### USAC / Lifeline team

**Rigorous vendor management**

**Additional capacity for stakeholder engagement and development of computer matching agreements**

**Complex project planning and KPI tracking**

**Additional advanced data analytics to detect waste, fraud, and abuse**

## Vendor capabilities

### Systems integrator

**Build the NV with all capabilities required to enable the timely and successful completion of its goals**

**Build the NV to comply with all applicable security- and privacy-related standards and regulations**

**Test the NV systems to ensure an optimal user experience**

### BPO provider

**Manual processes and consumer call center to:**

- Conduct manual eligibility reviews when automatic checks are not available
- Receive and process mail-in applications and IVR recertifications
- Support communication methods (e.g., mail recertification notices)

**General consumer support, including for all dispute resolutions**

# Total budget to run NV ~\$40-55M by steady state in 2020

Build costs expected to be ~\$35-40M (spent over 3 years)

## Total Build Budget for the National Verifier

**National Verifier build grand total (\$)**  
(costs incurred over ~3 years)

~\$35-\$40M

Through June 2018, USAC is on budget for the project and expects this trend to continue

## Budget Estimate for the National Verifier<sup>1</sup> – Steady state in 2020

### Assumptions for steady state:

- The NV has launched nationwide;
- All available federal / state data sources are integrated; and
  - Large majority of eligibility verifications are automated
- Approximately 15M applicants and 13M subscribers.

### Verification:

- Application processing;
- Eligibility verification (automated / manual); and
- Recertification outreach.

~ \$25-30M

See comparison to current costs incurred by SPs on next slide

### Consumer support:

~ \$10-15M

### Tech systems / tools:

~ \$4-6M

### Human capital:

~ \$3-5M

Costs will grow from now until 2020 as more states launch NV

### Operations grand total (\$)

~\$40-\$55M

1. Cost estimates based on interviews with Service Providers and state administrators. Volume assumptions vary annually and these assume a steady state subscribership of approximately 13M.



# NV direct verification costs expected to be half of direct verification costs currently incurred by service provider

## Efficiencies gained by the National Verifier

### Increased automated verification for enrollment

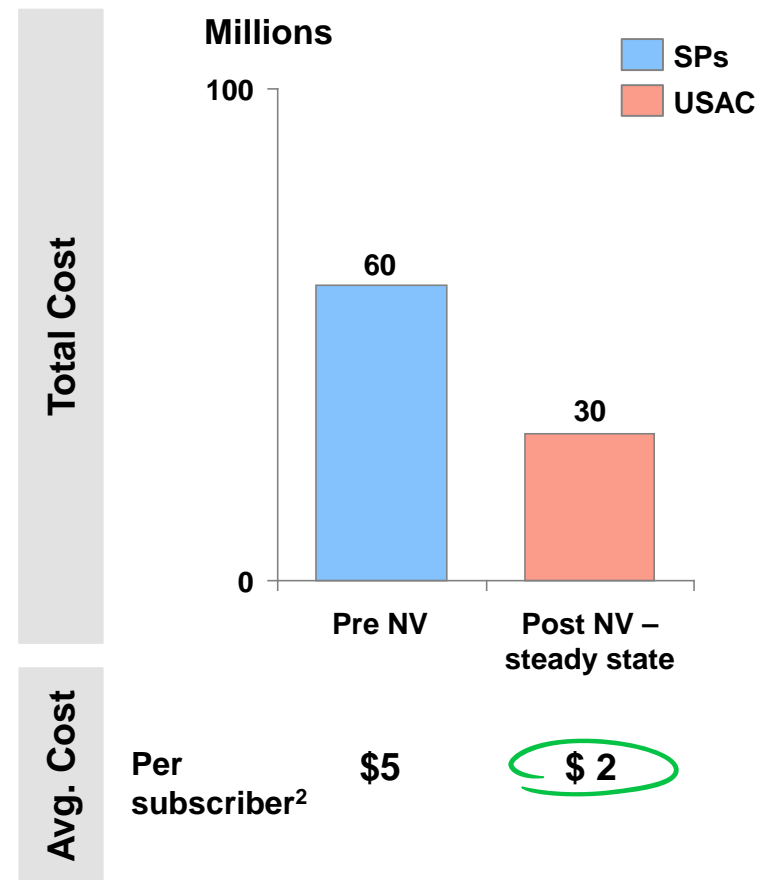
- Automated API link to federal and state data sources where possible; and
- Costly manual verification only if applicant is not found in a data source.

### Automated verification and notification for recertification

- Costly outreach (e.g., mail and reminder calls / texts) only if subscriber is not found in a data source.

**Larger volumes enable efficiencies of scale and drive down costs.**

## Estimated direct verification cost savings<sup>1</sup>



1. Only includes enrollment and recertification costs for automated and manual verification; does not include consumer support, tech systems, or human capital costs.

2. Assumes 13M subscribers both pre-NV and post-NV.

Note: In some states, third parties administer eligibility verification and incur costs

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## Eligibility Data Sources: Executive summary

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**The NV system connects with data sources to verify identity and determine if a Lifeline applicant is eligible.**

**NLAD has always utilized third party identification and address verification services. The NV continues to use these services and will also utilize eligibility data sources.**

**USAC and the FCC are working with state and federal agencies, as well as Tribal governments who administer qualifying programs, to obtain access to eligibility information.**

**This process culminates in computer matching agreements between USAC, the FCC, and the entities who maintain eligibility program enrollment data.**

**Where automated data sources are not available, the NV utilizes manual processes to review eligibility documentation submitted by the consumer.**

# The National Verifier interacts with distinct data sources to answer each question in the application process

Application question	Verification Step	Activity to complete	Data source
Does your personal information pass identity verification?	Identity & address check	Check applicant personally identifiable information (PII) against third party identity verification system (TPIV); conduct address verification;	NLAD
Are neither you nor anyone in your household currently receiving Lifeline?	Duplicate check	check applicant PII against those already enrolled in Lifeline	NLAD
Are you eligible for the Lifeline program?	Eligibility check	<p><b>1st Step:</b> Check applicant PII against automated data sources to determine if they are enrolled in a qualifying benefit program</p> <p><b>2nd Step (if necessary):</b> Conduct manual review to determine eligibility</p>	<p><b>1st Step:</b> State or federal data sources of qualifying programs</p> <p><b>2nd Step (if necessary):</b> Eligibility documents from qualifying programs</p>

*Focus of this section*

## Eligibility data sources can be accessed in a number of ways

The NV will access eligibility data through a variety of methods.

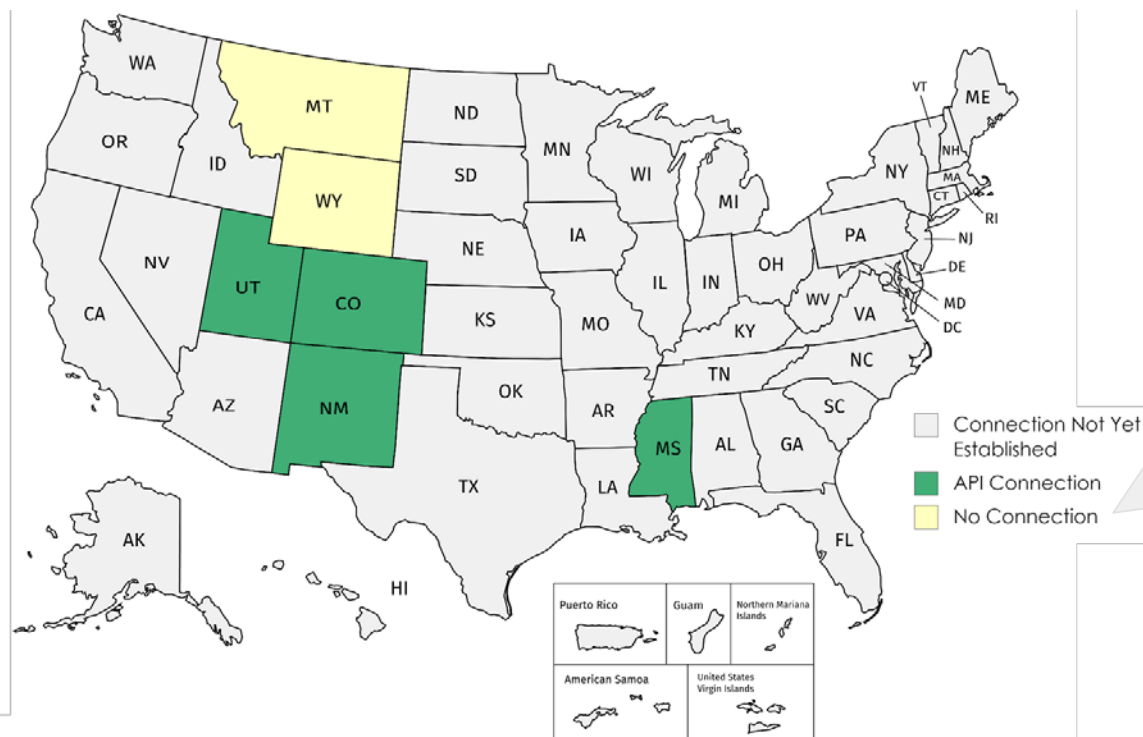
- **Application Program Interface (API):** Connections that transfer data in real time on a per inquiry basis.
- **Batch Processing:** Connections that provide results for multiple inquiries on a regular basis - daily, weekly or monthly.
- **Manual Web Look-Up:** Databases that have a portal function that allow people to type in certain identity information to determine the eligibility of an applicant based on their participation in a qualifying program.

**Due to cost, technology or other constraints, the NV may not always have an automated data source to verify a consumer's eligibility in every state or territory.** In these cases, consumers will need to submit eligibility documentation for review.

**USAC and the FCC are pursuing as many automated connections as possible that are cost-effective in order to streamline the process and allow for near real-time responses.**

## The six states participating in the initial launch of the National Verifier have different connection types

The following six states are participating in the initial launch of the National Verifier: Colorado, Mississippi, Montana, New Mexico, Utah and Wyoming.



The NV does not have an automated connection with Montana or Wyoming due to cost and technology constraints.

Eligibility verification is performed by using available federal data sources or through manual review of documentation for consumers in these states.

The automated connection with United States Department of Housing and Urban Development (HUD) is also utilized in all participating states, regardless of the connection type with the individual state. USAC is pursuing additional nationwide data sources (e.g., federal agencies that manage qualifying programs) that will be used to validate eligibility in all implemented states and territories.

## Data needed to verify Lifeline eligibility is maintained by the agencies that manage the qualifying programs

For the initial launch of the NV, USAC and the FCC have built automated connections with the following state agencies:

State	Agency	Data Type
COLORADO	Office of Information Technology	Medicaid and SNAP
MISSISSIPPI	Department of Human Services	SNAP
NEW MEXICO	Human Services Department	Medicaid and SNAP
UTAH	Department of Workforce Services	Medicaid and SNAP

USAC has also built an automated connection to HUD to verify consumers who qualify through Federal Public Housing Assistance across all implemented states.

The five computer matching agreements are public documents and are available on USAC's website.

## USAC will work with additional states to build automated connections to their eligibility data sources

**Initially, USAC makes contact with a state and scopes the work. USAC and the FCC may engage in the following activities with the state:**

- Identify points of contact
- Conduct briefings for state officials about the Lifeline program and the NV
- Determine technical and programmatic limitations and assets at the state level
- Socialize timelines and USAC business requirements with state officials
- Determine best connection type to pursue

**If USAC, the FCC, and the state agency determine they would like to pursue an automated connection, USAC will:**

- Execute a computer matching agreement, which is signed by the FCC, USAC, and the state agency to ensure the data will be shared and used and the individual will not be unfairly denied benefits as required by the Privacy Act
- Execute an interconnection security agreement to ensure the data will be protected in accordance with the Privacy Act in accordance with National Institute of Standards and Technology (NIST) guidelines and Federal Information Security Management Act (FISMA) requirements
- Establish agreed upon business and technical requirements
- Develop and test connection based upon technical requirements



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## Process Flows and Descriptions: Executive summary

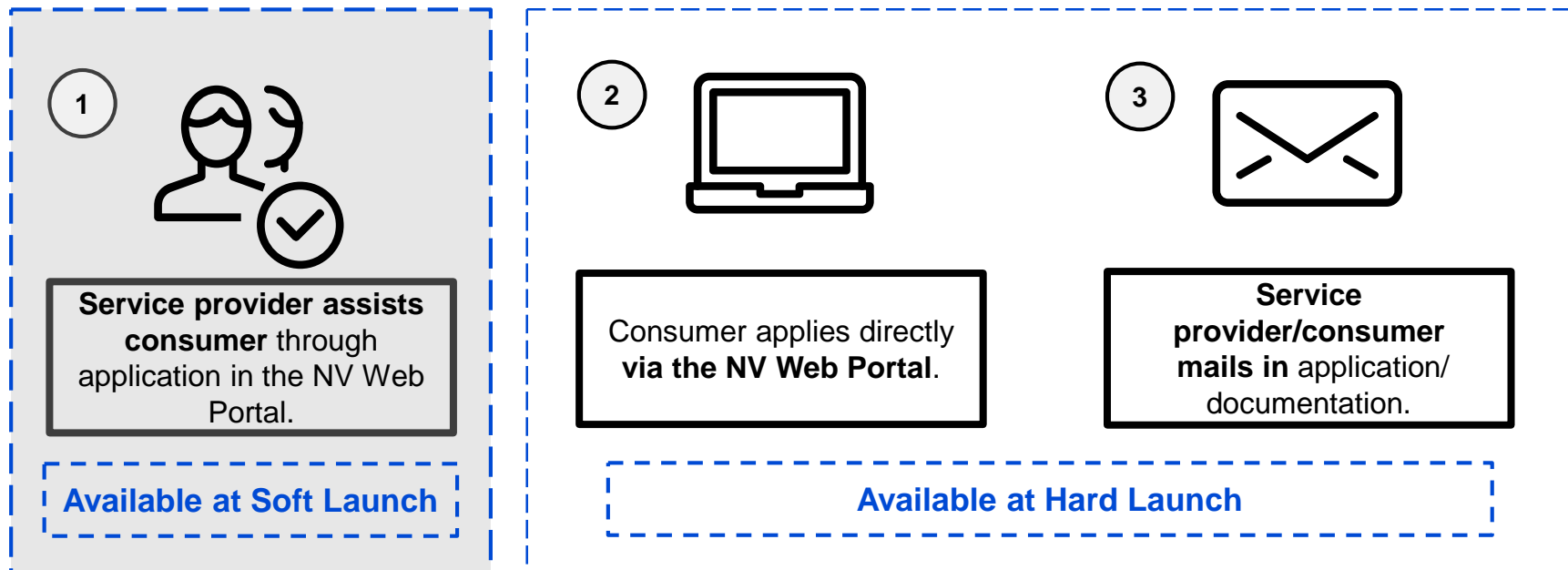
**Seven key processes are supported by the National Verifier. These include:**

- A** Eligibility Check
- B** Manual Review
- C** Consumer Information Update
- D** Benefit Transfer
- E** Recertification
- F** Reverification
- G** Claims and Disbursements

## Process Flows and Descriptions: Executive summary

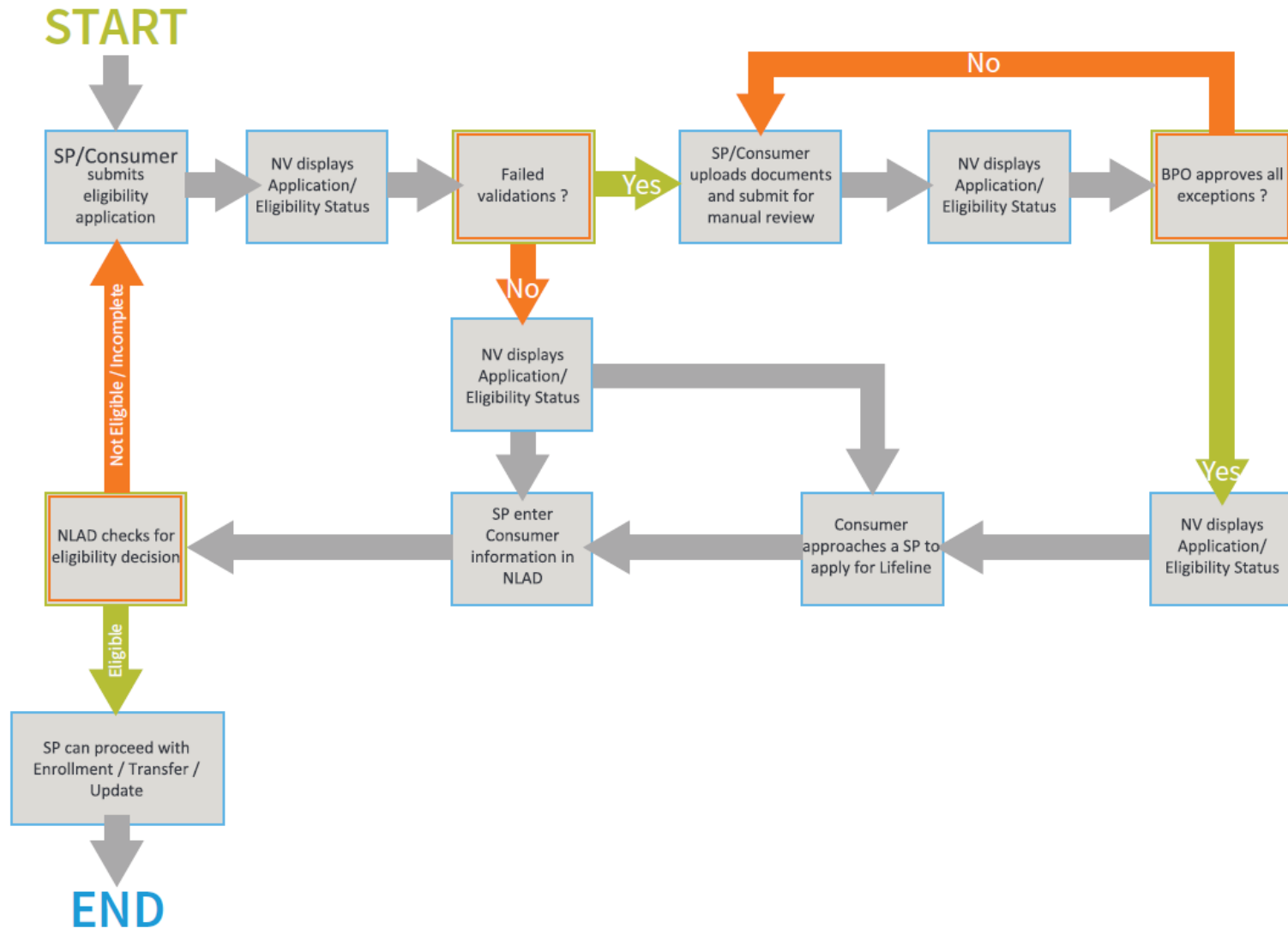
During soft launch, consumers will not have access to the portal and must work with a service provider to verify eligibility.

At hard launch, consumers will be able to apply on the portal without assistance from a service provider. In addition, service providers and consumers will be able to mail-in applications/documentation to USAC<sup>1</sup>.



<sup>1</sup> USAC may begin accepting mail shortly before hard launch. Stakeholders will be notified accordingly.

## Process Flow: Eligibility Check



## There are some key changes to the eligibility check process that accompany the launch of the National Verifier

### Before the National Verifier

Service providers **conducted eligibility checks**

Consumers were typically **only able to check their eligibility for Lifeline via one method (through SPs)**

Not all consumers **were able to check their application or eligibility status online** at a centralized location

### After Hard Launch of the National Verifier

The National Verifier system **centralizes eligibility verification**

**Applicants check eligibility directly** via the NV Web Portal, mail, or with assistance from a service provider

Consumers can **check their application and enrollment status online** or by contacting the Lifeline Support Center

## Process Description: Service provider access

**A Service Provider (SP) representative will log into the NV Web Portal using their credentials.**

**SP representatives are not permitted to share accounts; each user must have their own account. Representatives who already have NLAD accounts can use these credentials to log into the NV Web Portal.**

**If an SP representative does not have an existing NLAD account, they must have their Admin grant them the appropriate access level. The representative will be given credentials that they can use for the Portal.**

## Process Description: Application with SP Assistance

### 1 GATHER INFORMATION

The representative will ask the consumer for their information and enter it into the system. Information includes name, address, date of birth, last 4 digits of Social Security Number (SSN4) and qualifying program(s).

### 2 CONSENT, CERTIFY AND SIGN

The consumer must check a box indicating they consent to use their information to check if they qualify for Lifeline. The consumer must initial electronically that they agree to the Lifeline certifications and must type in their name to sign the application form.

**Note: SP representatives cannot consent, certify or sign on the consumer's behalf.**

### 3 RESULTS

Once the service provider representative finishes assisting the consumer with the process, the representative will see consumer's status and whether the consumer can be enrolled. Result types are detailed on the next page.

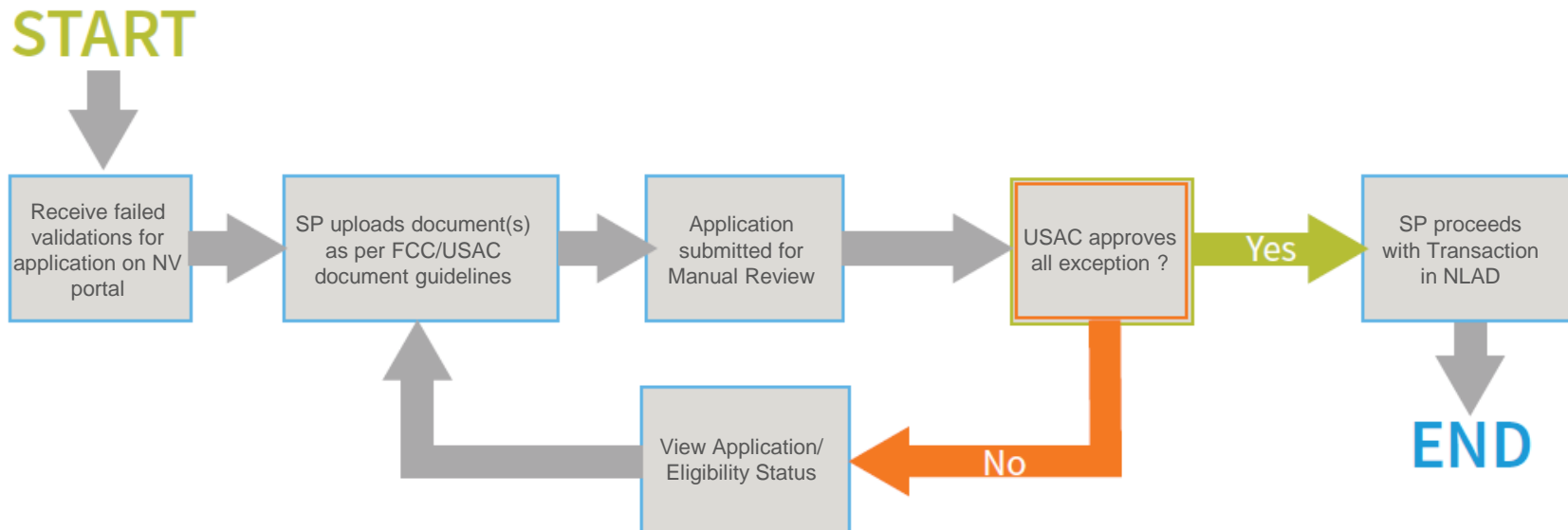
## Process Description: Result Types

After submitting all of the required information, the system will return one of the following results types:

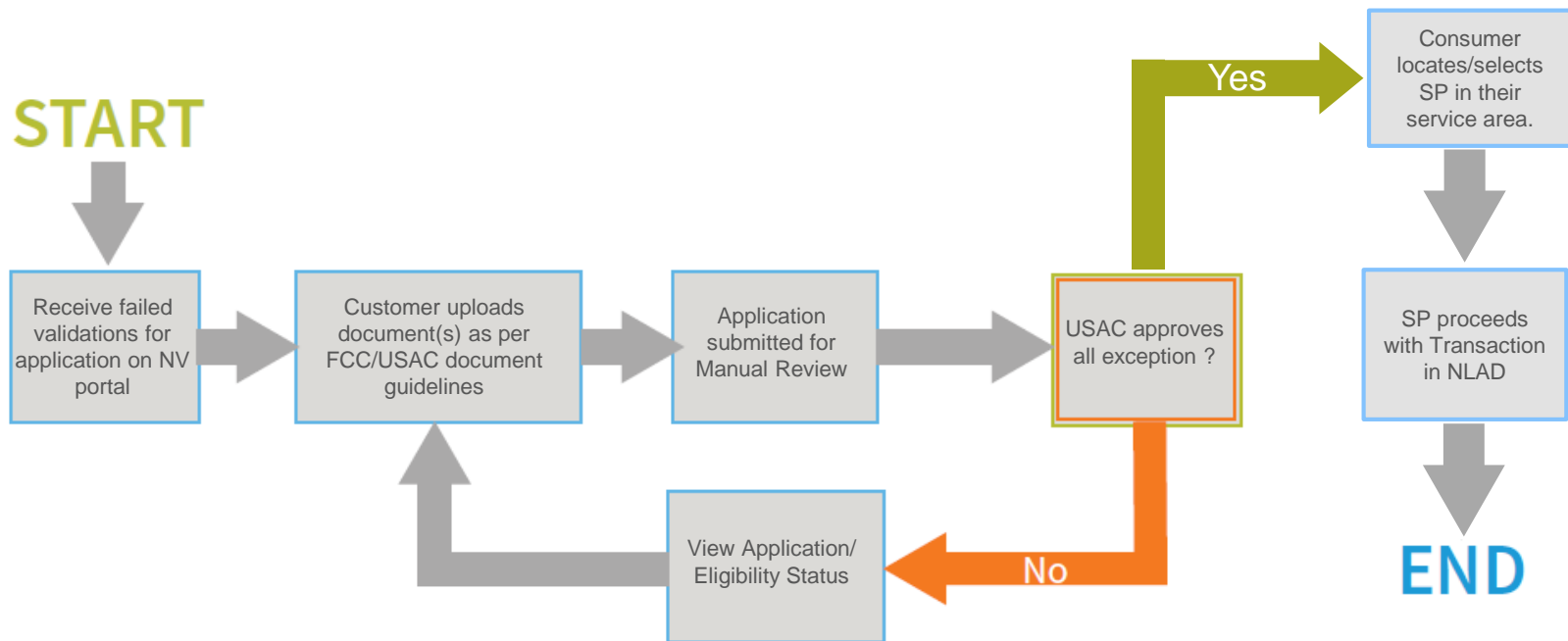
Result Type		Interpretation
"Already Enrolled in Lifeline."	➔	The consumer is already receiving Lifeline benefits, and no action is required. They can transfer their benefit to a new service provider, if desired.
"More Documentation Needed."	➔	The consumer's eligibility was not verified, and they need to submit documentation to prove their eligibility (which may include documents to support identity, address, program eligibility, etc.). <i>This is discussed in greater detail in the next process flow on Manual Review.</i>
"Pending Review."	➔	The consumer's Application Form is still under review by the Lifeline Support Center and an eligibility decision is pending.
"Qualified."	➔	The consumer is eligible for the Lifeline benefit and can be enrolled in NLAD. The consumer needs to be added to NLAD within 90 days or their "Qualified" eligibility result will expire.



## Process Flow: Manual Review (Service Provider)



## Process Flow: Manual Review (Consumer)



## There are some key changes to the manual review process in the National Verifier system

### Before the National Verifier

Service providers manually reviewed documentation on **behalf of the consumer**

### After Hard Launch of the National Verifier

**Consumer submits** required documents directly via the **NV Web Portal or mail**, and can ask for assistance from a service provider representative if needed

There was **variation** in **manual eligibility review procedures**

The Lifeline Support Center **centralizes** and **standardizes manual reviews**

## Process Description: Error types

**An application may result in a error that requires the consumer to submit additional documentation\* for Lifeline Support Center manual review.**

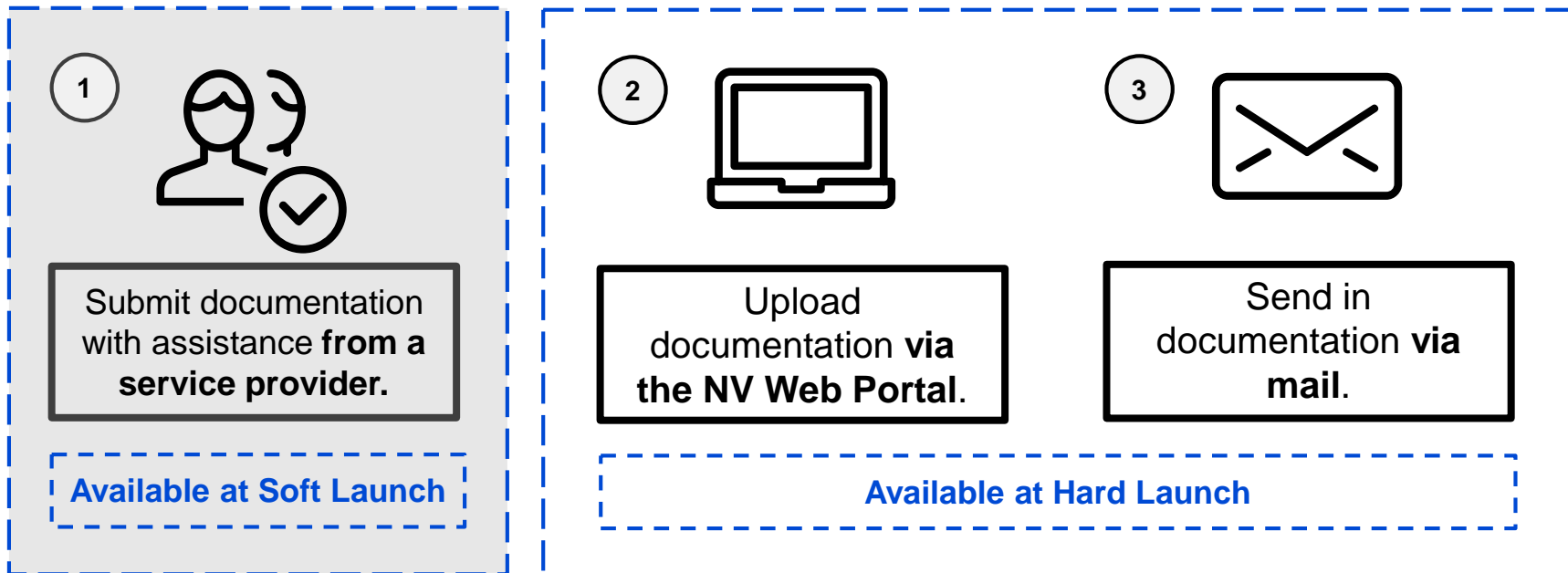
The following errors require additional documentation that must be mailed in or uploaded to the NV Web Portal.

Error		Document Required
TPIV (Identity Verification Error)	➔	Proof of identity
AMS (Address Verification Error)	➔	Proof of residential address
Duplicate Address	➔	Household Worksheet
Under 18	➔	Proof of emancipated minor status
Program Eligibility	➔	Proof of program/income eligibility

*\*A list of acceptable documents can be found on the [NV website](#).*

## Process Description: Document submission

If the consumer receives an eligibility error, they will be notified of the specific error type associated with their application.<sup>1</sup> Consumers may choose to submit documentation through the following methods.



<sup>1</sup>For applications through the portal, key information is communicated directly to the SP and /or consumer via the portal. Additional communication may arrive through email or mail, depending on if the consumer provided an email address during the application process.

## Process Description: Document submission results

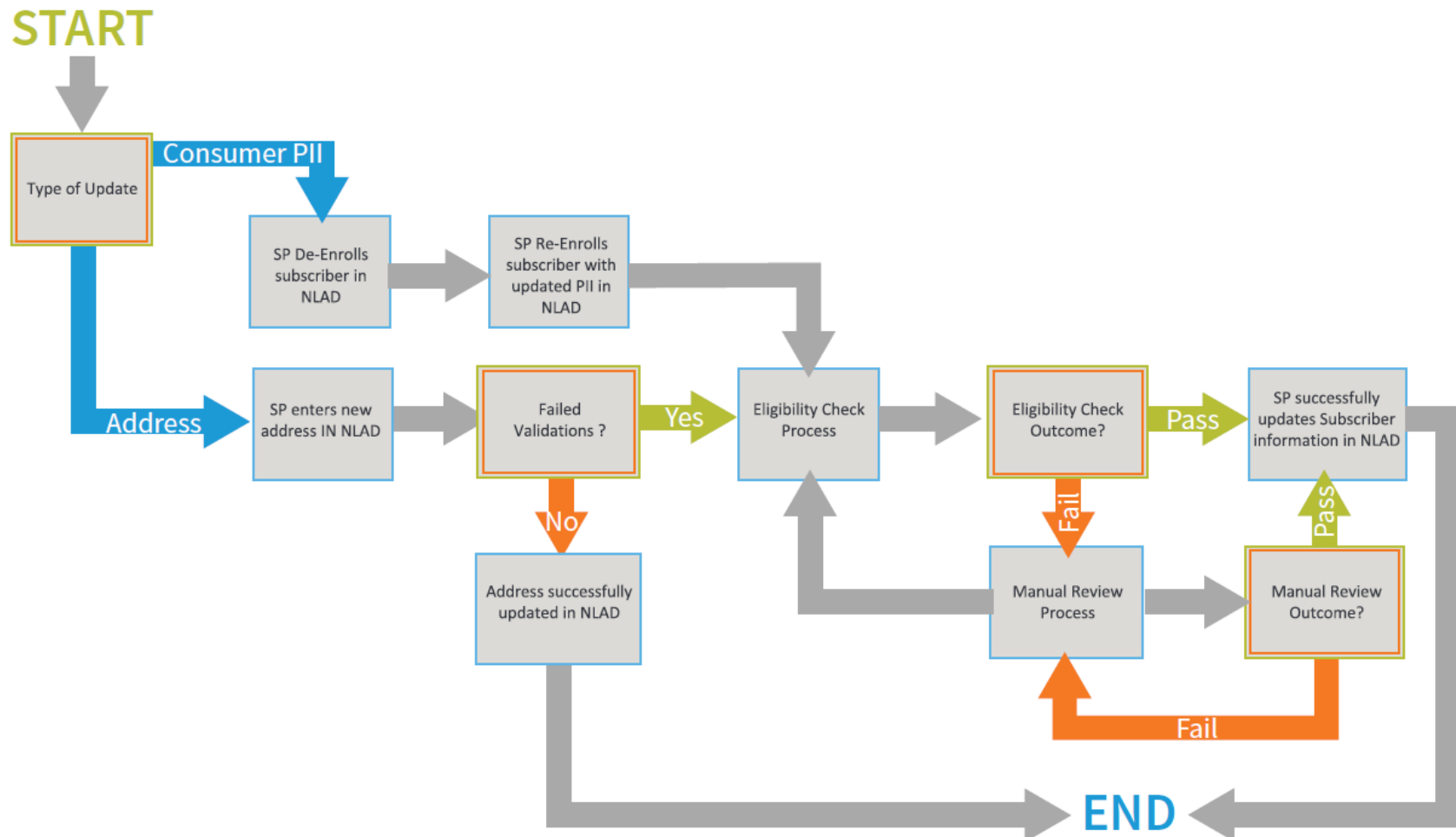
**After the service provider or consumer uploads all required supporting documents for manual review, the NV will display a confirmation message to confirm that USAC is reviewing the application to verify the consumer's eligibility to receive Lifeline.**

- If the eligibility check was initiated using the SP portal, the service provider can check the consumer's status through their account. Result types can be found on slide 31 in the Eligibility Check section. If the consumer is eligible, the SP will see their updated eligibility status in the status column of the home page.
- If the eligibility check was initiated by a consumer, their status will be provided to them by mail, email, and/or on the consumer portal (depending on their preferred method of contact).

**Upon notification that the consumer is "Qualified," the consumer can select a service provider and request to be enrolled in NLAD.**

**If the consumer's eligibility still cannot be verified after the documentation review, they can end their application process or ask an SP representative for assistance in submitting the necessary documentation to address the errors. The consumer can also dispute the result of the manual review.**

## Process Flow: Consumer Information Updates



## Process Description: Consumer Information Update

**An SP can only update a Subscriber's address in NLAD.**

### When the SP is trying to update the Subscriber's address:

- If the new address passed all validations, the update transaction in NLAD goes through successfully.
- If the new address fails the validations, NLAD checks LED for a valid application:
  - If a qualified application is found, the Update transaction in NLAD goes through successfully
  - If no valid application is found, the SP will have to run an Eligibility Application through the portal before the Update transaction can go through successfully.
- If during the eligibility check, the subscriber has failed any validation checks, they need to resolve those before the Update transaction can be successful.

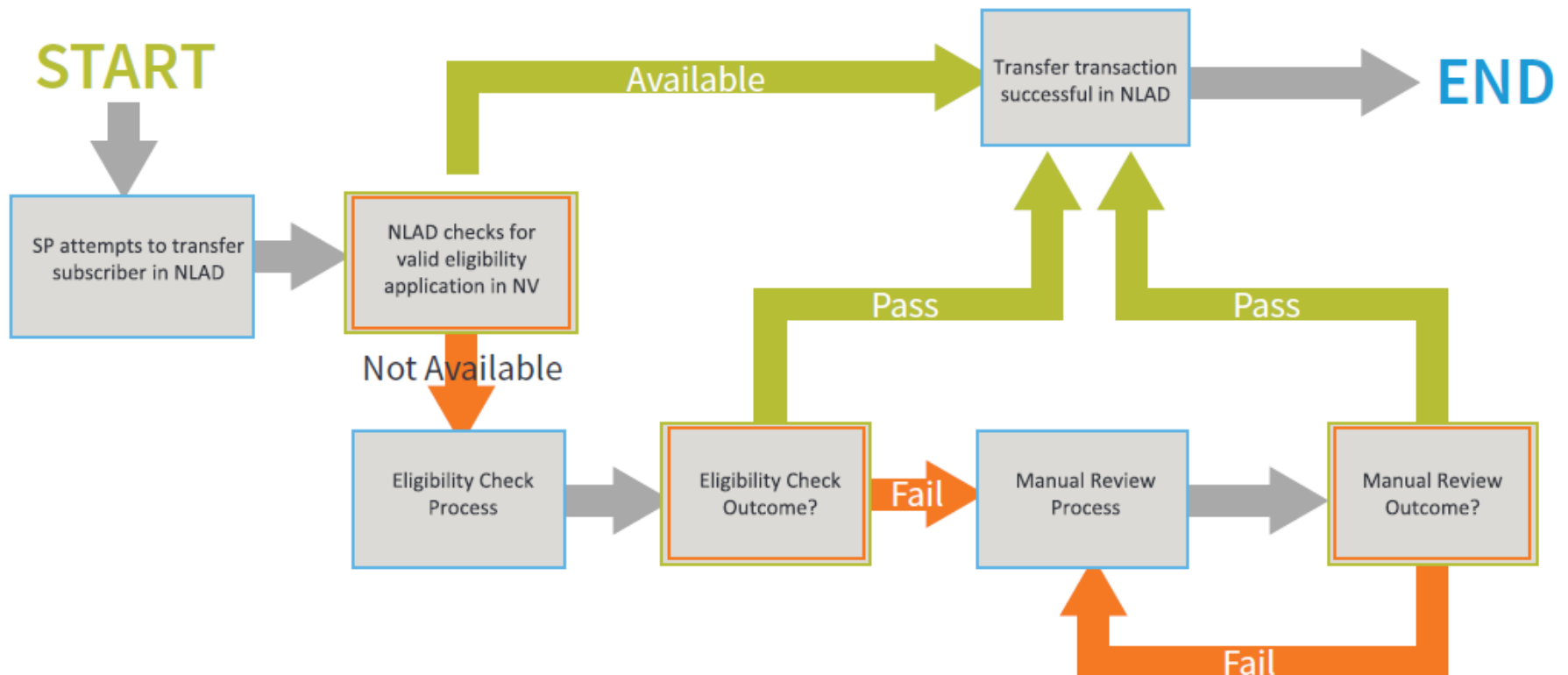
### In order for an SP to edit any other field (first/last name, DOB, L4SSN):

**The SP has to first de-enroll the subscriber from NLAD and then re-enroll with the corrected PII. When this happens, NLAD will check LED for a qualified application.**

- If a qualified application is found, the Enroll transaction in NLAD goes through successfully.
- If no application is found, the SP will have to submit an Eligibility Application in the portal before the Enroll transaction can go through successfully.
- If during the eligibility check, the subscriber has failed any validation check, they need to resolve those before the Enroll transaction can be successful.



## Process Flow: Benefit Transfer



## There are some key changes to the benefit transfer process in the National Verifier system.

### Before the National Verifier

New service provider representative  
initiates benefit transfer in NLAD

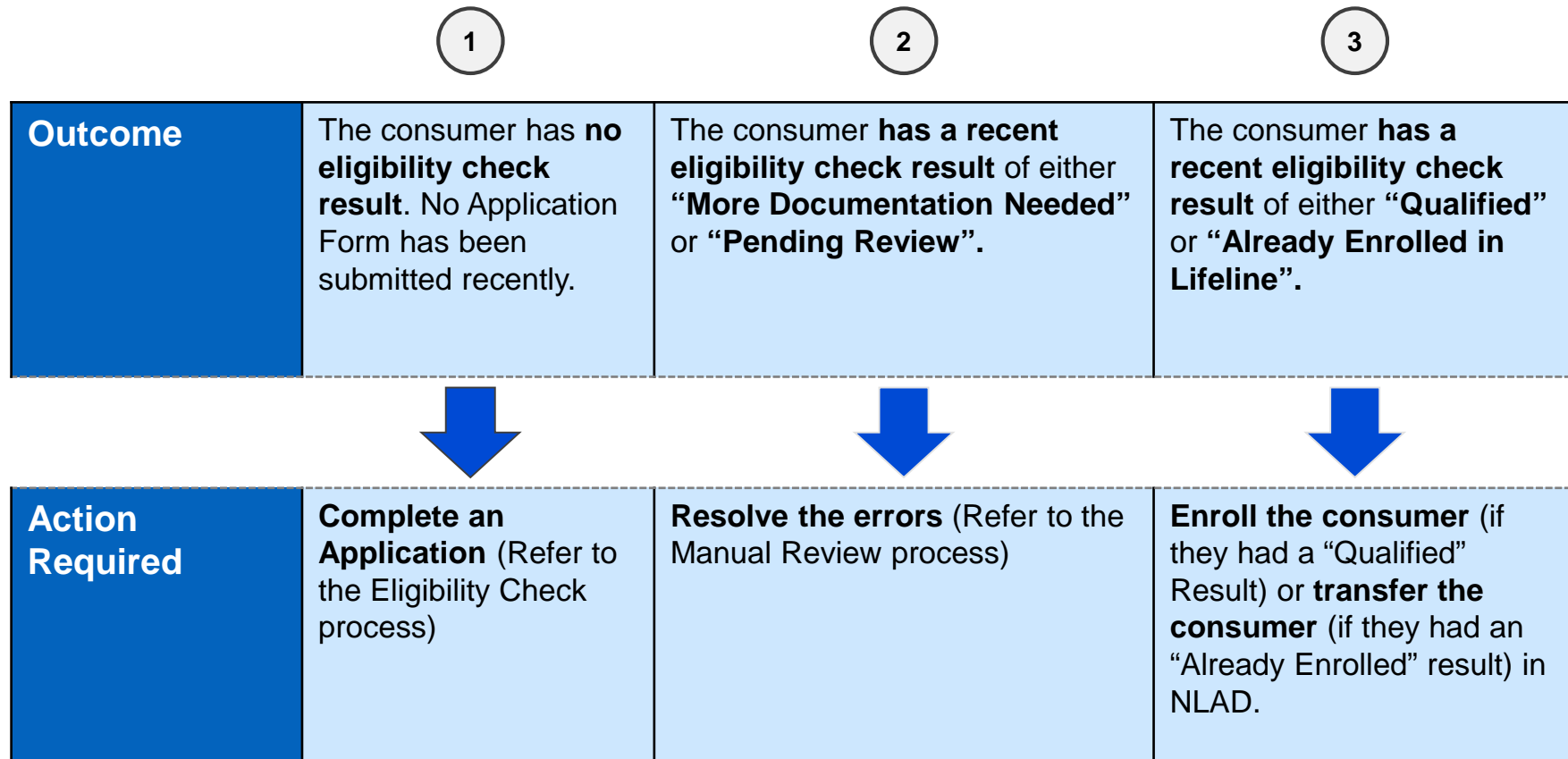
### After Hard Launch of the National Verifier

**Benefit transfers** cannot be conducted in  
NLAD unless **NV contains a successful  
eligibility check** for the consumer

## Process Description: Benefit Transfer

The new SP representative logs into NLAD or uses the NLAD API and submits the consumer's PII to check if the consumer has qualified within the last 90 days.

Through this check, the SP representative will see one of three possible outcomes:



## Process Description: Benefit Transfer

**Ultimately, the consumer must have an “Already Enrolled in Lifeline” or “Qualified” eligibility result to successfully transfer their benefit or be enrolled in Lifeline.**

Depending on the outcome of the NLAD check, they can arrive at these statuses through one of the following methods:

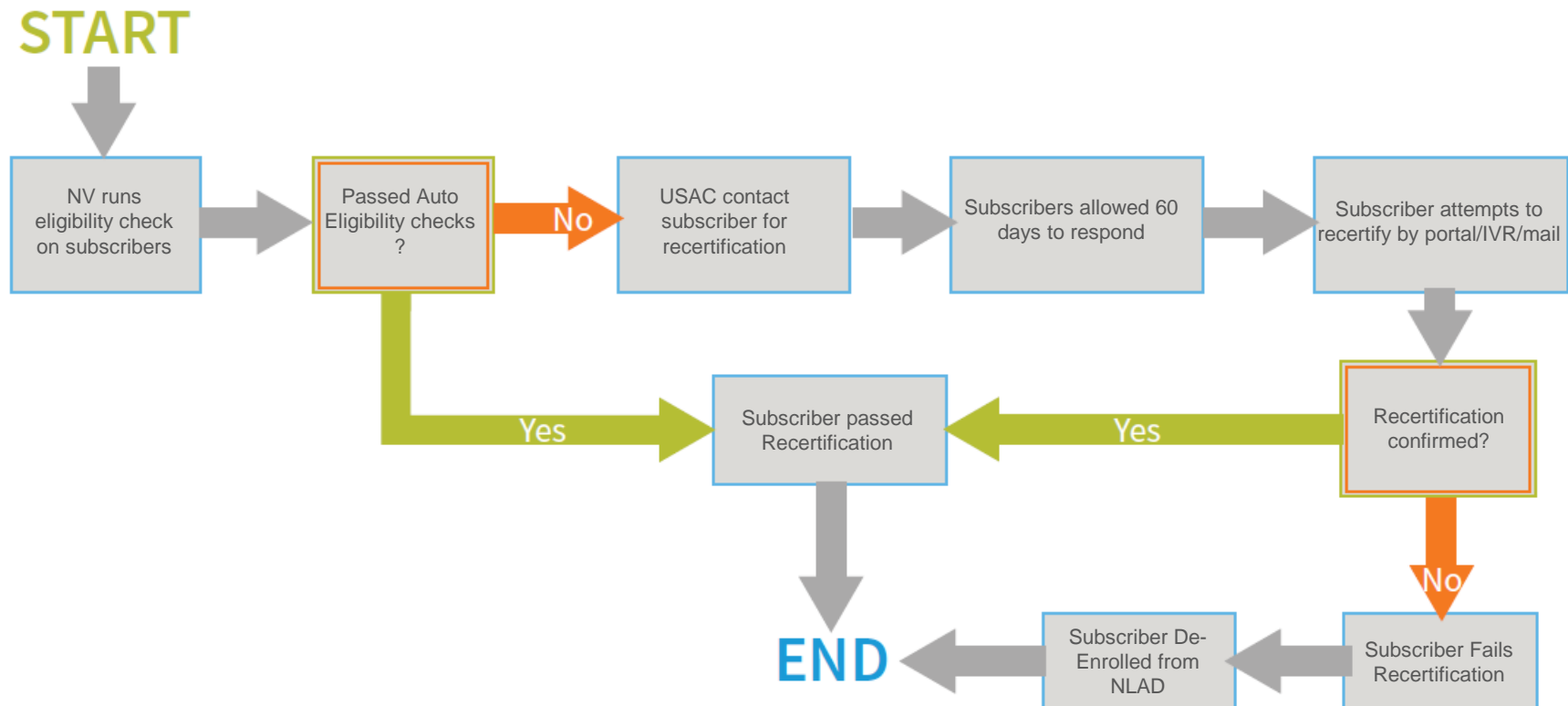
- The NLAD check results in an initial eligibility status of either “Qualified” or “Already Enrolled in Lifeline”.
- The consumer sees either of these statuses after completing an Application.
- The consumer sees either of these statuses after resolving their errors associated with their Application.

**Once the consumer has the “Already Enrolled in Lifeline” status, the service provider representative can perform the benefit transfer in NLAD. NLAD will:**

1. Label the consumer as having been transferred as the result of a benefit transfer.
2. Notify the old and new service providers of the change.
3. End the benefit transfer transaction.

**The SP should notify the consumer of the outcome.**

## Process Flow: Recertification



## There are some key changes to the recertification process in the National Verifier system.

### Before the National Verifier

SPs **led recertification** or opted for USAC-led coordination

SPs **de-enrolled consumers who did not manually self-certify**

### After the Hard Launch of the National Verifier

NV **automates recertification** and **prompts consumer action** when necessary

NLAD automatically **de-enrolls** consumers if they do not pass the automated recertification check and do not manually self-certify

## Process Description: Recertification

**Consumers already receiving a Lifeline benefit must recertify their eligibility every year to continue receiving their benefit.**

The National Verifier will complete recertification on a rolling basis, based on the consumer's Anniversary Date. Service providers will no longer conduct recertification in NV states.

The National Verifier will:

- Automate recertification via available state and federal data sources.
- Allow consumers the opportunity to conduct manual self-certification when they do not pass the automated recertification check.
- Provide dynamic status reporting to service providers to track their customers' recertification results.

In National Verifier states, consumers who do not pass the automated recertification check must go through official USAC manual self-certification processes via the NV Web Portal, IVR, or mail. Consumers in NV states cannot manually self-certify through any other processes.

## Process Description: Recertification

If a consumer does not pass automated recertification, they will receive a letter from the Lifeline Support Center offering multiple ways to manually self-certify. Below are the different processes through which a consumer can manually self-certify:



1. Manually self-certify directly **via the NV Web Portal.**



2. Manually self-certify directly **via IVR.**

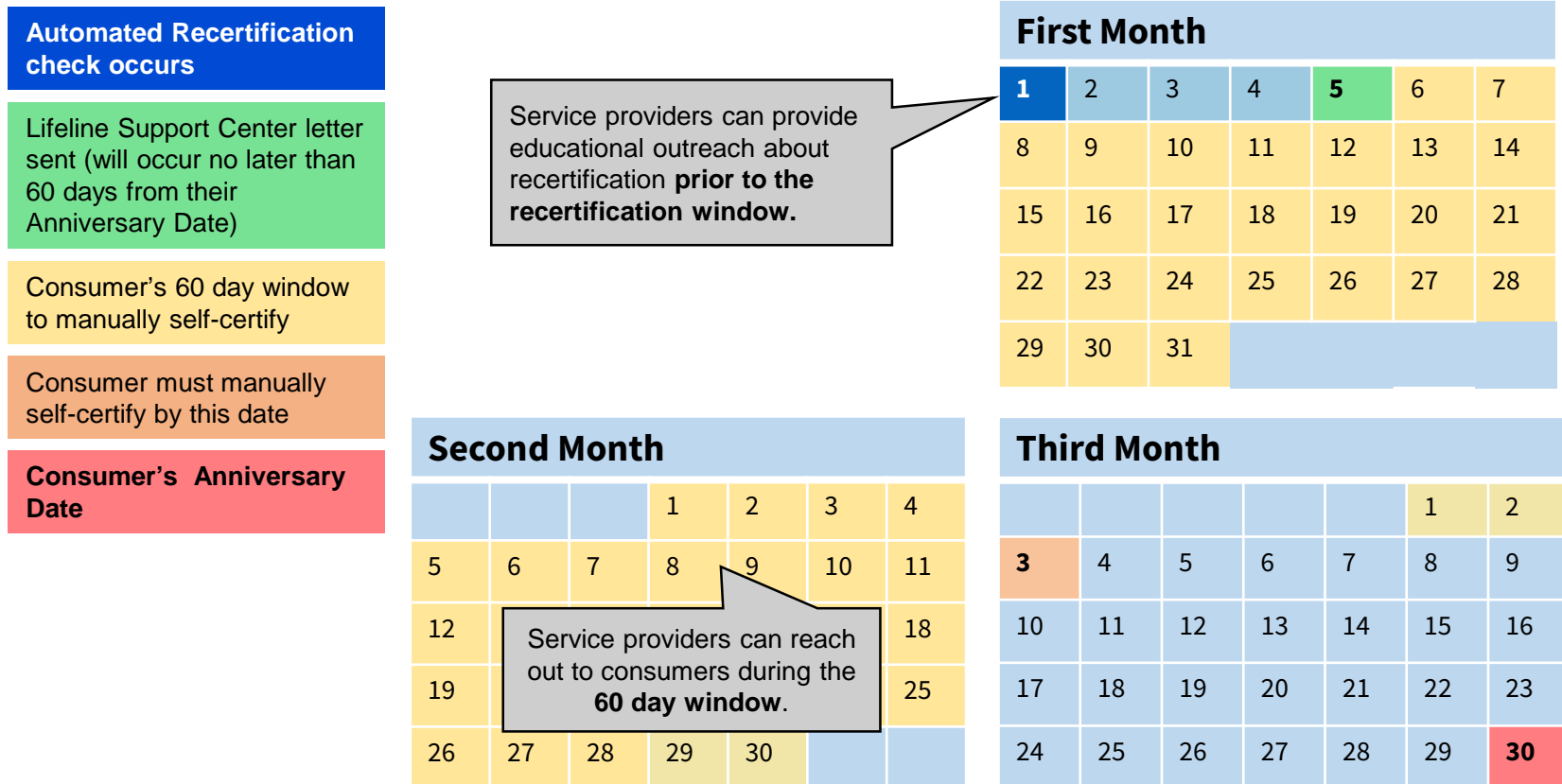


3. Manually self-certify directly **via mail.**



## Process Description: Recertification

SPs have a time period when they can reach out to the consumer and encourage manual recertification. Below is an example timeline detailing when the service provider can assist with this process.

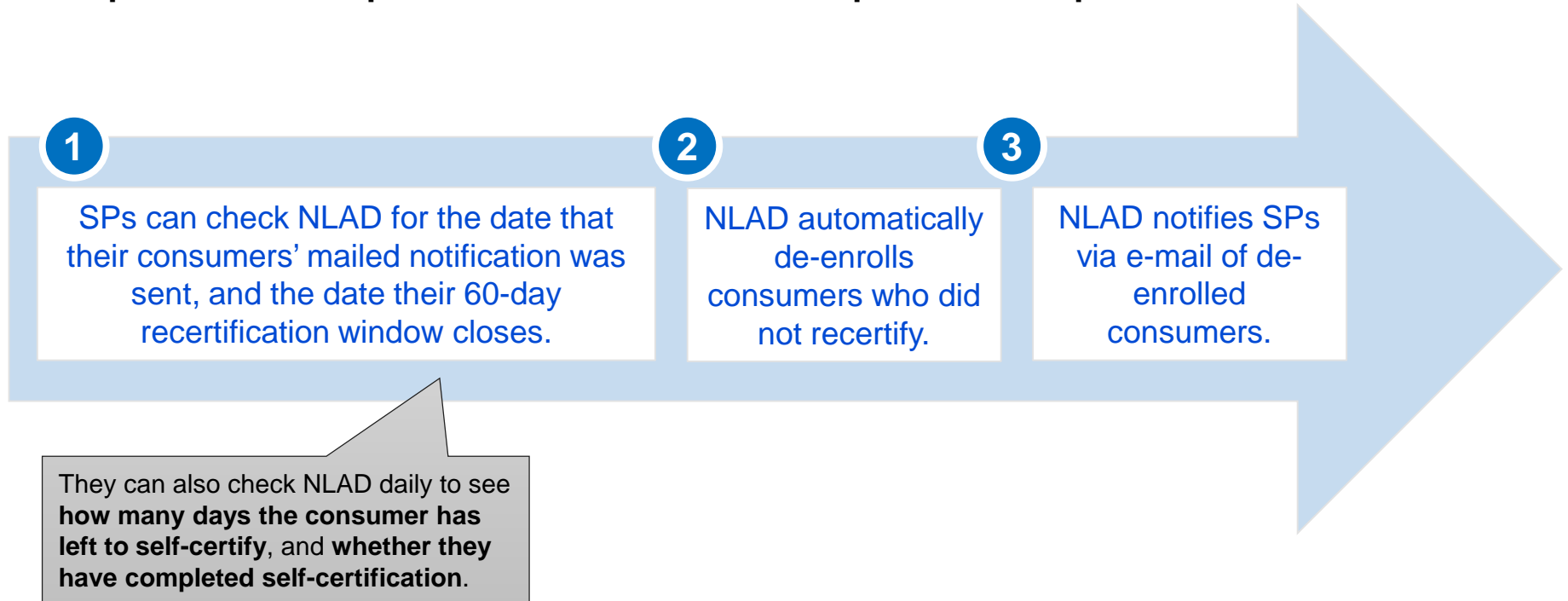


Service providers can provide educational outreach about recertification **prior to the recertification window.**

Service providers can reach out to consumers during the **60 day window.**

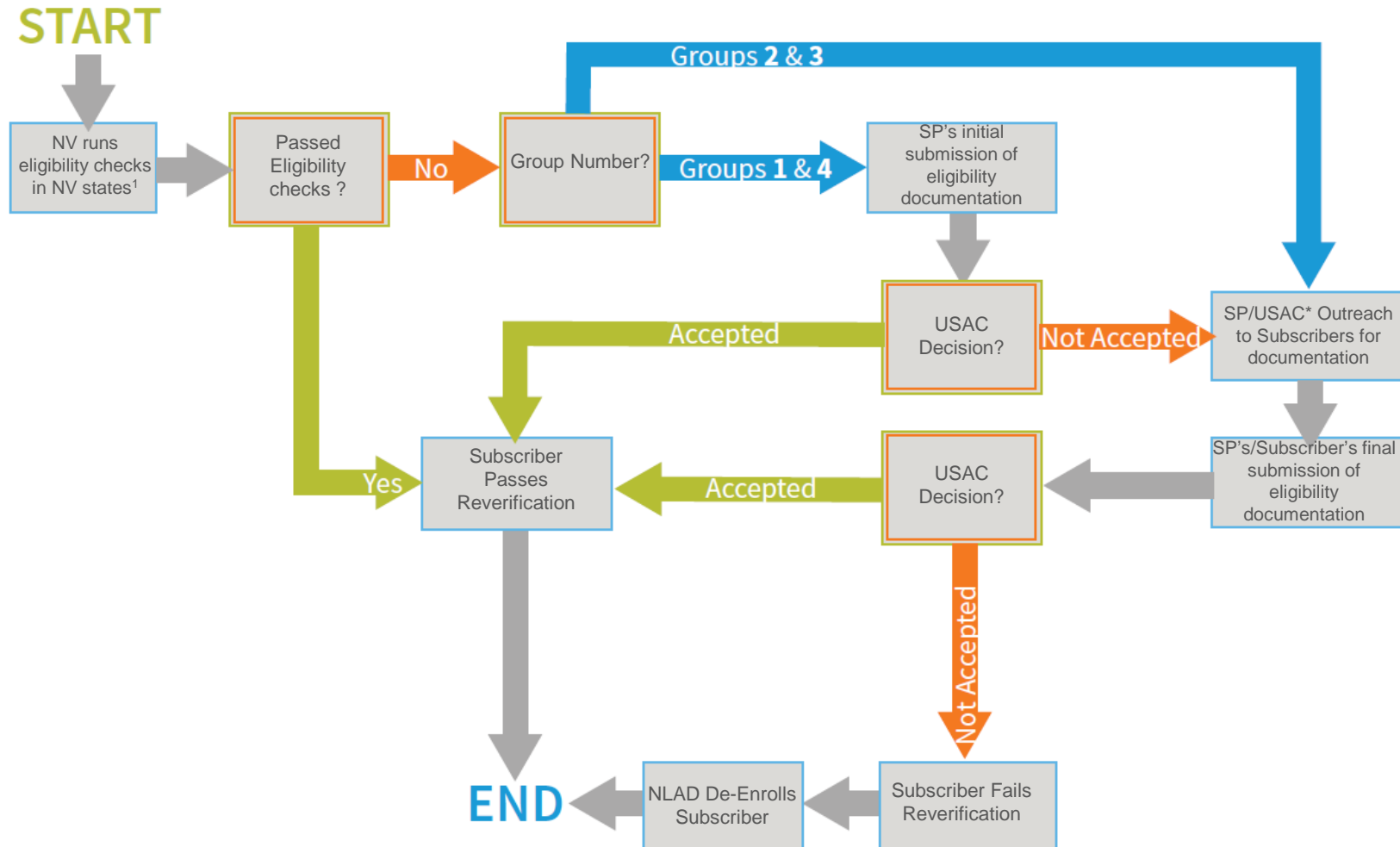
## Process Description: Recertification

If consumers do not successfully manually self-certify within 60 days of their Lifeline Support Center letter being sent, they will be automatically de-enrolled. NLAD will compile a list of consumers who did not recertify, de-enroll them, and notify the consumers and their respective service providers. The de-enrollment process is depicted below:



**Note:** SPs will also have access to relevant recertification information via NLAD reports.

## Process Flow: Reverification



¹The reverification process outlined on this slide only applies to states that are in the National Verifier.

\*USAC-Elected Reverification

## Process Description: Reverification

**When the NV launches in a state, the eligibility of all Lifeline subscribers in that state will be reverified.**

- USAC will run existing NLAD subscriber records through the NV to conduct an automated eligibility check (database check)
- If the NV cannot confirm the consumer's eligibility, service providers must follow the reverification process to confirm the subscriber's eligibility before their record will be accepted by the National Verifier

## Process Description: Reverification

**Reverification is the one-time process to confirm that all existing Lifeline subscribers meet the National Verifier's eligibility standards.**

**Reverification is different from annual recertification.**

Main differences:

- Reverification happens once, when the NV launches in a state.
- SPs must complete reverification for all existing subscribers; it is not related to when they last recertified.
- Reverification resets the subscriber's anniversary date and fulfills the annual recertification requirements.
- USAC-elected recertification and USAC-elected reverification are two separate and distinct processes. Enrollment in one does not enroll an SP in the other, and a separate election form is required.

## Process Description: Reverification

### Process Information

SPs will reverify subscribers in the initial launch states in four groups, based on their Lifeline enrollment date:

- **Group 1:** Subscribers enrolled January 1, 2018, through the soft launch
- **Group 2:** Subscribers with January - June anniversary dates, enrolled any year prior to 2018
- **Group 3:** Subscribers with July - December anniversary dates, enrolled prior to 2018
- **Group 4:** Subscribers enrolled through the legacy process during the soft launch period

Groups 1 & 4 have subscribers who enrolled in January 2018 and later.

Groups 2 & 3 have subscribers who enrolled prior to January 2018.

For additional instructions please reference the USAC [website](#)

## Process Description: Reverification

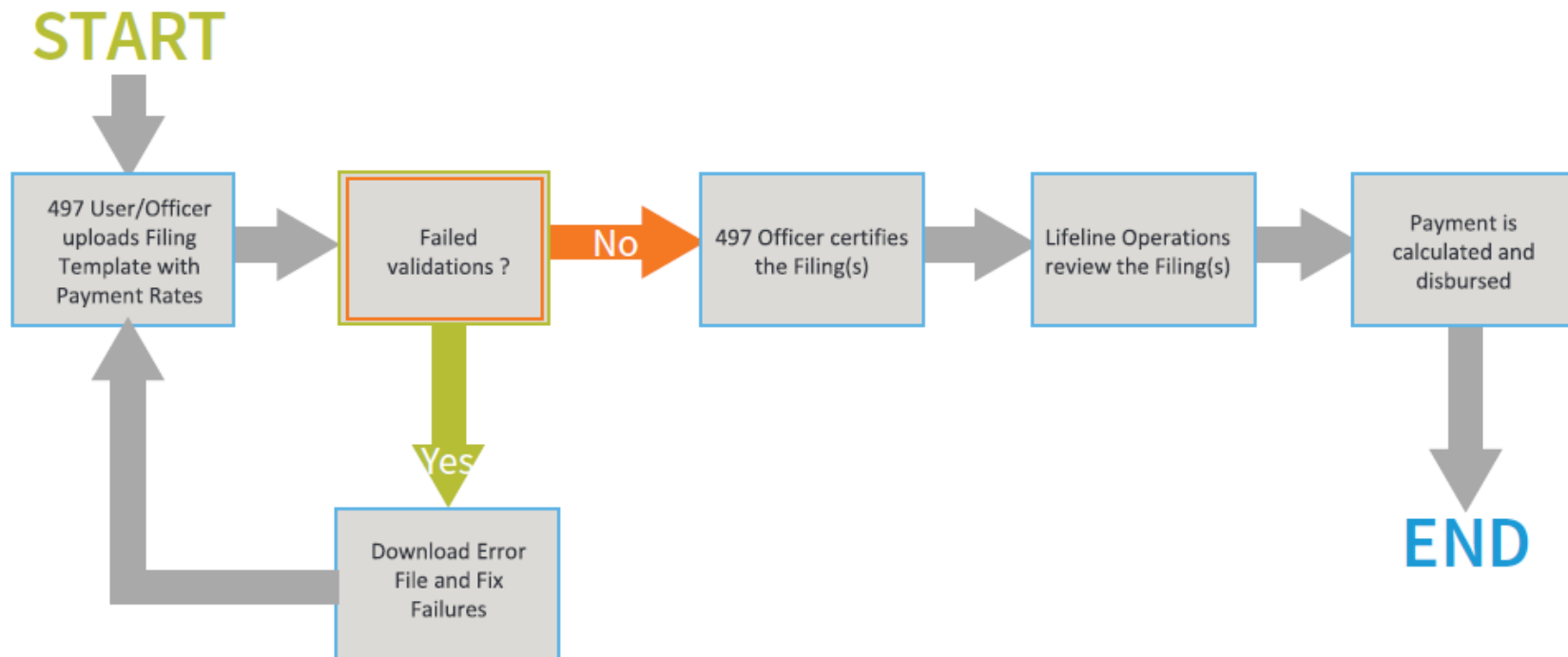
### Timing

Occurs during the soft launch period. Specific schedules and deadlines for each launch are determined by USAC.

USAC will attempt to re-verify all subscribers' eligibility for Lifeline using existing database connections established for the initial wave states.

For consumers that do not pass the database check, SPs serving customers in initial launch states must send USAC proof of eligibility. USAC will notify SPs when it is time to begin this outreach process.

## Process Flow: Claims and Disbursements



This change is not specific to the National Verifier and applies to all ETCs.



## Process Description: Claims and Disbursements

### What is new about this process:

The FCC Form 497 was retired after the December 2017 data month filings.

For data months prior to January 2018, claims should be submitted using the FCC Form 497.

Starting with the January 2018 data month, all SPs in all states began using the new Lifeline Claims System (LCS). In this new system, service providers:

- (1) Download a report of subscribers eligible for reimbursement from NLAD.
- (2) Add the dollar amount for subscribers being claimed (or reason code for subscribers being unclaimed), before certifying/ submitting the filing for processing.
- (3) Carriers in NLAD opt-out states will not download their list of eligible subscribers; they will upload their subscriber lists directly to LCS.

### What remains the same:

ETCs are still required to submit a claim (even if there are no changes since previous month).

Snapshot taken on the first day of the month shows the subscriber count for the prior month.

- For example: A snapshot taken on February 1 shows the subscriber count for the January data month.

ETCs to receive reimbursement in the same month if claim is certified by the 8<sup>th</sup> of the month.

Options to report quarterly or up to one year after data month.

Lifeline reimbursement claims do not result in any automatic de-enrollments.

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## Success Metrics: Executive Summary

**Establishing the right metrics is critical to monitoring the success of the NV.**

**Key performance indicators (KPIs) must measure the success of the NV based on goals outlined in the 2016 Lifeline Order:**

- Reducing waste, fraud, and abuse to improve program integrity;
- Improving consumer experience; and
- Reducing cost and complexity.

**Thus far, we have identified four primary key performance indicators (KPIs) to be tracked by the Lifeline team on a regular basis.**

- USAC Leadership will review these primary KPIs and facilitate data-driven executive decision making.
- These KPIs complement broader Lifeline metrics that are tracked on a regular basis.
- The KPIs will evolve over time as we continue the rollout of the NV.

**USAC will also monitor additional general program metrics (e.g., transaction volume, recertification percentage) to identify anomalies and outliers.**

## Based on goals in the 2016 Lifeline Order, we have identified KPIs to measure the success of the NV

	1 Stronger Program Integrity	2 Enhanced Consumer Experience	3 Cost Effectiveness
GOALS	<p><b>Protect against and reduce fraud, waste and abuse</b></p> <ul style="list-style-type: none"> <li>• Increase accountability of Lifeline program; and</li> <li>• Reduce payments to ineligible subscribers.</li> </ul>	<p><b>Improve consumer experience in the enrollment process</b></p> <ul style="list-style-type: none"> <li>• Streamline consumer application channels; and</li> <li>• Provide consumer support; and</li> <li>• Reduce complexity</li> </ul>	<p><b>Lower costs through increasing administrative efficiencies</b></p> <ul style="list-style-type: none"> <li>• Provide automated eligibility verification; and</li> <li>• Streamline processes for enrollment, recertification, &amp; reimbursement to SPs.</li> </ul>

**The biggest one time impact on Program Integrity and Cost Effectiveness is expected with the reverification process conducted when a state rolls into the NV.**

This process will de-enroll consumers that are not found in the databases USAC has connected to and cannot provide necessary documentation to prove their eligibility.

## Key Metrics and KPI Matrix

These key metrics will help USAC monitor the success of the National Verifier in the three key areas of **Program Integrity**, **Cost Effectiveness**, and **Consumer Experience**.

KPI/Metric	Program Integrity	Consumer Experience	Cost Effectiveness
% of Enrollments Requiring Manual Review	✓	✓	✓
Repeat Cases (Customer Service or Application Processing)	✓	✓	✓
Processing Time		✓	✓
Actual versus Projected Volumes			✓

**We will also use data analytics to track for anomalies and outliers across a number of general program metrics.**

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## User Support: Executive summary

**Proactively engaging key stakeholders is critical to the success of the NV.**

Stakeholder feedback helps USAC access opportunities and understand the implications of the decisions we make for those who will interact with the NV regularly.

**To best assist stakeholders, USAC has implemented a comprehensive training plan for SPs serving consumers in states where the NV has launched. Training content includes:**





- Live courses delivered via webinar
- Live SP assistance sessions to answer questions in between webinars
- Supplemental user support materials, including how-to guides, video demonstrations, and FAQ responses

**During the delay, USAC kept stakeholders engaged by providing periodic updates, sharing portal demos, updating web content and re-presenting system trainings. USAC also supported stakeholders as they prepared to participate in the NV by conducting one-on-one outreach to address concerns.**

**As we look forward, USAC will engage stakeholders who do business in future wave states through:**

- Webinars
- Outreach calls
- Educational content

## 4 types of supplemental materials were created in order to provide user assistance outside of formal trainings

	Material	Description	Sample Topics
	<b>User Guide</b>	<ul style="list-style-type: none"> <li>Provide comprehensive guidance on system navigation and use</li> </ul>	SP functions including: <ul style="list-style-type: none"> <li>Accessibility</li> <li>Eligibility</li> <li>Document Submission</li> </ul>
	<b>How-To Guides</b>	<ul style="list-style-type: none"> <li>Provide brief how-to screen demonstrations</li> <li>Focus on one particular system function per video</li> </ul>	<ul style="list-style-type: none"> <li>Eligibility Check as a SP</li> <li>Document Submission as a SP</li> </ul>
	<b>Video Tutorials</b>	<ul style="list-style-type: none"> <li>Deliver detailed step-by-step instructions on how to perform specific functions</li> <li>Incorporate screen captures</li> </ul>	<ul style="list-style-type: none"> <li>Eligibility Check as a SP</li> <li>Document Submission as a SP</li> <li>Benefit Transfer as a Service SP</li> </ul>
	<b>FAQ Responses</b>	<ul style="list-style-type: none"> <li>Provide answers to common stakeholder questions</li> <li>Organized by category or theme</li> </ul>	Themes include: <ul style="list-style-type: none"> <li>Accessibility</li> <li>Eligibility</li> <li>Document Submission</li> <li>Benefit Transfer</li> </ul>

These materials are available to SPs in initial launch states on USAC's website and can be [accessed here](#).



## During soft launch, service providers in the initial launch will be able to contact USAC through multiple avenues

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### **Dedicated Soft Launch Support Sessions**

- USAC will hold regular SP assistance sessions after the launch date.
- These sessions will be hosted live on GoToWebinar, and USAC will answer questions and collect user feedback.

### **Lifeline Support Center Accessibility**

- The Lifeline Support Center customer service representatives will be able to answer questions from service providers submitted via e-mail and phone.
- The Lifeline Support Center is available to initial wave carriers and consumers from 9 a.m. to 9 p.m. ET, Monday through Sunday.
  - Carrier Lifeline Support Center: 1-877-524-1325
  - Customer Lifeline Support Center: 1-800-234-9473

## As future waves of states join the National Verifier, USAC will provide additional training and support sessions

**USAC will gather feedback from NV initial launch participants to refine and update training and support for future waves. This training and support will include:**

- Webinars
- How-To guides
- FAQ updates
- Support sessions

**USAC continues to engage stakeholders outside of the initial launch states**

- **NV system demonstrations:** USAC walks stakeholders through the NVconsumer and SP portals.
- **Monthly calls with NARUC:** USAC shares information with and gathered feedback from representatives of the states about the NV system and processes.
- **Newsletter outreach:** USAC shares NV updates in the Lifeline monthly newsletter.
- **Web content:** USAC creates an NV-dedicated section on USAC.org to inform stakeholders about systems and processes.

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## Privacy and Information Security: Executive summary

**Privacy and data security have been key considerations throughout the development of the NV and its associated processes.**

- USAC obtained the Authority to Operate (ATO) prior to the launch of the NV in compliance with the Federal Information Security Management Act (FISMA) .
- USAC's Privacy and Security Teams have been, and will continue to be, key contributors and integral partners throughout the design and implementation process.
- USAC ensures that the NV continues to adhere to all applicable federal and state security and privacy requirements standards, inclusive of any vendors or contractors who may work on or with the NV.

**The NV and its associated processes have been designed to minimize risks stemming from data collection and retention.**

- The NV collects the minimum amount of sensitive PII that is required to successfully execute on its goals.
- USAC maintains an appropriate data retention policy for all applicant / subscriber data.
  - All data retention policies comply with USAC and FCC records schedule(s).

## The NV and its related processes must comply with federal privacy and security laws

**USAC supports the FCC in administering federal programs. Therefore, USAC adheres to federal privacy and security regulations, including but not limited to the Privacy Act and the FISMA.**

The NV is a designated federal system of records. The system has undergone FISMA accreditation, completing the six-step Risk Management Framework (RMF) established by the National Institute of Standards and Technology (NIST).

**FISMA accreditation for the NV helps to ensure that the system is secured and the proper NIST security and privacy controls are operating effectively and that the system undergoes continuous monitoring.**

Any changes or modifications to the NV will be assessed and the system security plan (SSP) will be updated accordingly. USAC has also implemented appropriate privacy controls such as obtaining consent, collecting and using the minimum amount of PII necessary, and using PII only for authorized purposes.

**USAC vendors and subcontractors are contractually required to meet the same security and privacy requirements as USAC.**

**USAC continues to invest resources into additional testing for the NV to ensure the reliability, availability, and security of the system.**

## The NV is designed to minimize data collection and retention to the extent possible in order to limit exposure to risk

**Subscriber / process information:** Keep limited information (including some PII)

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### Information provided by subscribers

- **Name (First, Last)**
- **Address**
- **Date of birth**
- **Social Security Number (last four digits)**
- Eligibility for enhanced Tribal subsidy
- Self-reported qualifying program(s)
- Preferred method of communication
- Contact information (e.g., phone, email)
- Type of service (e.g., broadband, mobile)
- Submitted documents (e.g., for manual review)



**Fields typically  
transmitted to query  
eligibility sources**

### Data generated through NV processes

- Yes / no decision on eligibility from each data source queried (i.e., each program)
- Date of verification
- Application channel (e.g., mail, web portal)
- Name and unique ID of individual SP employee performing any transaction

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## USAC response to Frequently Asked Questions (1/4)

### FAQ

### USAC response

What are the functions of the National Verifier system?

The National Verifier system will:

- Determine initial consumer eligibility
- Conduct annual recertification
- Populate the Lifeline Eligibility Database (all subscribers deemed eligible for the Lifeline Program)
- Track all subscribers enrolled in Lifeline through NLAD
- Record sales agent information in order to log agent activity

Can the National Verifier be used in states other than the states in the initial launch? Do the new NV forms have to be used in all states?

The National Verifier can only be used in states where the National Verifier has launched. Once the National Verifier has launched in a state, the NV Web Portal and relevant NV forms must be used. For non-NV states, service providers were required to begin using Lifeline program universal forms as of July 1, 2018.

What is the difference between soft and hard launch?

The primary difference is that at soft launch, only service providers will be able to use the NV Web Portal, while at hard launch both service providers and consumers can use the NV Web Portal.

Starting at soft launch, service providers have the option to start using the NV Web Portal and NV forms, but are not mandated to do so until the hard launch.



## USAC response to Frequently Asked Questions (2/4)

FAQ	USAC response
When must service providers in the initial launch states start using the NV and its processes?	<p>Starting at hard launch, all service providers in the initial launch states must use NV processes. Starting at soft launch, service providers have the option to use the National Verifier to check consumer eligibility, or they can choose to use their legacy process for checking eligibility.</p> <p>If they choose to use the National Verifier process to check consumer eligibility, they must use the new National Verifier forms.</p>
How can service providers access the NV Web Portal?	<p>Service provider representatives can use their existing NLAD credentials in order to access the NV Web Portal. If they do not have existing credentials, a person with Service Provider Administrator credentials in NLAD can create new service provider accounts.</p> <p>The NLAD account types have the same permissions in the NV Web Portal, and varying permissions in NLAD depending on the user type.</p>
Is there an API for the NV Web Portal?	No, there is no API available associated with the NV Web Portal.
Will there be a NV Web Portal available in Spanish?	Yes, the consumer NV Web Portal and printed versions of forms will be available in Spanish. The service provider NV Web Portal is only available in English at this time.

## USAC response to Frequently Asked Questions (3/4)

### FAQ

### USAC response

What is the difference between applying and enrolling? Can the NV Web Portal be used to enroll a consumer?

The National Verifier enables consumers, and service providers assisting them, to apply for Lifeline by checking their eligibility. Consumers must be eligible for Lifeline and receive a "Qualified" status before they then can be enrolled in Lifeline.

The NV cannot be used to enroll consumers in Lifeline; enrollments must occur in NLAD.

What are the different ways that consumers can check their eligibility for the Lifeline benefit?

A consumer can apply or check their eligibility for Lifeline with the assistance of a service provider via the service provider NV Web Portal (available at soft launch), the consumer NV Web Portal (available at hard launch), and a printed version of the Application Form submitted via mail to the Lifeline Support Center (available at hard launch).

When do consumers need to provide documentation?

When consumers apply, there is a possibility that the NV will be able to verify their eligibility automatically (if they are qualifying through a program that has an automated data source) and no additional documentation will be needed to validate a consumer's eligibility.

If there are errors associated with a consumer's application, they will need to provide additional documentation to resolve the errors in order to eventually receive a "Qualified" eligibility status. In addition, if the consumer is qualifying through a program that cannot be checked using an automated data source, the consumer will need to provide documentation so that their eligibility can be checked manually.

## USAC response to Frequently Asked Questions (4/4)

### FAQ

Is a NV Web Portal account needed in order to use the NV Web Portal?

### USAC response

All consumers using the consumer NV Web Portal or service provider representatives using the service provider NV Web Portal must have their own individual accounts. No one is allowed to share accounts with another person.

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## Glossary (1/4)

Term	Definition	Explanation
AMS	Address Management System	A service provided by the U.S. Post Office that allows subscribers to verify the existence of an address, and to standardize it into proper format.
API	Application Programming Interface	A code that allows two software programs to interact with one another. The API defines the correct methods by which a developer can write a program that requests services from another application.
BPO	Business Process Outsourcing	The process of contracting non-primary business activities to a third-party vendor (e.g., consumer support / service, manual review support).
CMA	Computer Matching Agreement	The computerized comparison of records for the purpose of establishing or verifying eligibility for a federal benefit program.
Data use agreement	Data use agreement	A formal agreement between two parties to establish protocols and standards that govern the handling (including storage) of any data transferred between the parties.
Dispute resolution	Dispute resolution process	A process by which USAC, through the National Verifier, will review an adverse decision upon the request of the applicant.
FCC	Federal Communications Commission	An independent agency of the United States Federal Government charged with regulating interstate and international communications by radio, television, wire, satellite and cable in all US states and territories.
Form 497	Form filled out by Lifeline SPs to claim Lifeline subsidies	Form for Service Providers that have provided eligible consumers with Lifeline Program-supported service to receive reimbursement for providing service at discounted rates. This form is no longer being used to receive reimbursement after the December 2017 data month.

## Glossary (2/4)

Term	Definition	Explanation
IEH	Independent Economic Household	A unit that may only receive one Lifeline benefit (commonly known as the one-per-household rule); also refers to a form that certain consumers must submit in order to certify that no more than one Lifeline benefit is received per household.
IVR	Interactive Voice Response	Technology that allows humans to interact with a computer over the phone, through use of speech recognition and/or the telephone keypad.
KPI	Key Performance Indicator	A business metric used to evaluate performance with respect to factors crucial to the success of the National Verifier.
LED	Lifeline Eligibility Database	System to check whether a consumer is eligible for Lifeline based on income or enrollment in qualifying assistance programs.
NARUC	National Association of Regulatory Utility Commissioners	National association representing state public service (utility) commissioners.
NLAD	National Lifeline Accountability Database	Existing system that allows SPs to check on a real time, nationwide basis whether a consumer is already receiving a Lifeline Program-supported service, and to maintain records of Lifeline subscribers.
NV	National Verifier	A system to conduct eligibility determinations and other functions necessary to enroll eligible subscribers into Lifeline.
PII	Personally identifiable information	Any information about an individual that can be used to distinguish or trace an individual's identity either alone or when combined with other information that is linked or linkable to a specific individual.

## Glossary (3/4)

Term	Definition	Explanation
RFP	Request for Proposal	A document issued by an organization that desires to procure services or commodities; the document typically outlines the services or commodities desired and initiates the formal procurement process.
SI	Systems integrator	A company that specializes in integrating multiple component subsystems or parts into a single system.
System of Records	System of Records	A group of records under control of any federal agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual.
SORN	System of Records Notice	A notice in the Federal Register in which a federal agency announces the establishment, amendment, or deletion of a system of records.
SP	Service Provider	A telecommunications company that provides service (i.e., wireline voice, wireless voice, wireline broadband, wireless broadband) to consumers.
States	States, territories, and tribal lands	50 U.S. states + DC, Puerto Rico, Guam, U.S. Virgin Islands, Northern Mariana Islands, American Samoa, and tribal lands.
TPIV	Third party identity verification	A service that verifies the existence of a person who corresponds to the PII submitted by an applicant by using public and private records (e.g., birth certificates, real estate ownership, credit history).
UI/UX	User Interface / User Experience	The components of a system that humans interact with, as well as the actual experience of an end user's interaction with the system.

## Glossary (4/4)

Term	Definition	Explanation
USAC	The Universal Service Administrative Company	A non-profit corporation designated by the Federal Communications Commission (FCC) as the permanent administrator of the Universal Service Fund (USF), which includes the Lifeline program.
USF	Universal Service Fund	A fund, established by the Telecommunications Act of 1996, whose goal is to ensure that every American has access to vital telecommunications services; the Lifeline program is a component of the USF.
Verifier partner	A data source used to check for Lifeline eligibility	An agency or organization (often, but not exclusively, governmental) that partners with the National Verifier to provide a data source that the National Verifier can check in order to determine whether an applicant is eligible for the Lifeline subsidy.